

participation in a venture which has engaged in such acts of recruiting, enticing, harboring, transporting, providing, and obtaining, by any means of minor females knowing the minor females had not attained the age of 18 years and would be caused to engage in a commercial sex act, and adult females knowing force, fraud, and coercion would be used to cause the person to engage in a commercial sex act, in violation of Title 18 United States Code, Section 1591(a)(1) and (a)(2); (b) knowingly transport individuals who have not attained the age of 18 years in interstate commerce with the intent that these individuals engage in prostitution, in violation of Title 18, United States Code, Section 2423(a); (c) knowingly transport individuals in interstate commerce with the intent that these individuals engage in prostitution, in violation of Title 18, United States Code, Section 2421; and (d) knowingly persuade, induce, entice, and coerce, and attempt to persuade, induce, entice, and coerce individuals to travel in interstate commerce to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendants WILLIAM HORNBEAK, ANDRE MCDANIELS, KRISTEN LAND, and RONNIE PRESLEY would recruit minor females to work as prostitutes.
2. Defendants JOHN BUTLER, WILLIAM HORNBEAK, KRISTEN LAND, and ANDRE MCDANIELS would recruit adult females to work as prostitutes.
3. Defendants ANDRE MCDANIELS, WILLIAM HORNBEAK, and RONNIE PRESLEY would have sexual intercourse with the minor females.
4. Defendants WILLIAM HORNBEAK and ANDRE MCDANIELS would fly the adult and

minor females from various locations in Nevada, Arizona, and Florida to Houston, Texas so that they could work as prostitutes.

5. Defendants WILLIAM HORNBEAK, JOHN BUTLER, ANDRE MCDANIELS, and RONNIE PRESLEY would instruct, or have other prostitutes they controlled instruct, the minor and adult females to perform certain acts to insure that the customers they were servicing were not law enforcement officers.

6. Defendants WILLIAM HORNBEAK and ANDRE MCDANIELS would keep session sheets to record the number of "tricks" turned and the amount of money paid by customers serviced by the adult and minor females at various commercialized sex businesses.

7. Defendants JOHN BUTLER, WILLIAM HORNBEAK, JAMINE LAKE, ANDRE MCDANIELS, and RONNIE PRESLEY would beat the adult and minor females to instill fear in them and insure their obedience.

8. Defendants JOHN BUTLER, WILLIAM HORNBEAK, JAMINE LAKE, ANDRE MCDANIELS, and RONNIE PRESLEY kept all proceeds from the acts of prostitution committed by adult and minor females under their control.

9. Defendants ANDRE MCDANIELS, JOHN BUTLER, WILLIAM HORNBEAK, JAMINE LAKE, and KRISTEN LAND engaged in a series of telephone conversations for the purpose of furthering the criminal goals of the prostitution enterprise.

C. OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, defendants JOHN BUTLER, WILLIAM HORNBEAK, JAMINE LAKE, KRISTIN LAND, ANDRE MCDANIELS, and RONNIE PRESLEY, and others known and unknown to the Grand Jury,

committed various overt acts within the Southern District of Texas and elsewhere, including but not limited to the following:

1. On or about May 1, 2005 through July 1, 2005 the Defendant JOHN BUTLER collected from Jessica Ford all money she earned performing commercial sex acts.
2. On or about June 2005 through July 2005, Defendant ANDRE MCDANIELS collected from Jessica Ford all her earnings performing commercial sex acts at a Houston commercial sex business Total Pleasure and also in Nevada; Defendant ANDREW MCDANIELS then paid for Jessica Ford's airfare to fly from Nevada to Houston, Texas to continue to work in one of his commercialized sex business.
3. On or about January 2006, after a series of raids by local law enforcement at several commercialized sex businesses, Defendant JOHN BUTLER moved Jessica Ford to Taboo Modeling Studio North.
4. On or about May 1, 2005 through September 2008, Defendants ANDRE MCDANIELS, JOHN BUTLER, and JAMINE LAKE physically abused and beat Jessica Ford.
5. On or about May 1, 2005, Defendant RONNIE PRESLEY beat J.N.W., a minor female, pulled a gun on her, forced her into his vehicle, and transported J.N.W. from Kansas to Texas.
6. On or about May 1, 2005 through July 31, 2005, Defendant RONNIE PRESLEY collected from J.N.W. all the money she earned from commercialized sex acts.
7. On or about July 2005, Defendant RONNIE PRESLEY threatened harm to J.N.W.'s family if she told her family about her involvement in prostitution with him.
8. On or about July 2005, Defendant RONNIE PRESLEY physically abused and beat J.N.W.
9. On or about July 2005, Defendant RONNIE PRESLEY attempted to sell J.N.W. to

another “pimp” for purposes of commercialized sex.

10. On or about May 2006 through June 2006, Defendant RONNIE PRESLEY prostituted A.M., a minor female, at a “track” in Houston, and at Total Pleasure.

11. On or about May 2006 through June 2006, Defendant RONNIE PRESLEY collected from A.M all the money she earned from commercial sex acts.

12. On or about May 2006 through June 2006, Defendant RONNIE PRESLEY physically abused and beat A.M.

13. On or about May 2006 through June 2006, Defendant RONNIE PRESLEY sold A.M. to another “pimp” for the purpose of prostitution.

14. On or about September 1, 2006, Defendant RONNIE PRESLEY transported a J.N.M.W., a minor female, from Kansas to Houston, and drove her to the Taboo Modeling Studio North.

15. On or about September 2006, Defendant RONNIE PRESLEY collected from J.N.M.W all the money she earned from commercial sex acts at Taboo Modeling Studio North.

16. On or about September 2006, Defendant RONNIE PRESLEY physically abused and beat other girls in the presence of J.N.M.W. at Taboo Modeling Studio North.

17. On or about October 2006 through April 3, 2007, Defendant ANDRE McDANIELS collected from K.H, a minor female, all the money she earned from commercial sex acts.

18. On or about December 5, 2006, Defendant WILLIAM HORNBEAK drove B.S.R., a minor female, to a customer for a prostitution “out call” where B.S.R. agreed to perform sexual acts for an amount of money.

19. On or about April 3, 2007 and April 4, 2007, the Defendants ANDRE MCDANIELS,

WILLIAM HORNBEAK, JAMINE LAKE, and JOHN BUTLER engaged in a series of telephone conversations relating to the operation of their commercial sex businesses.

20. On or about March 2007 through May 2007, Defendant ANDRE MCDANIELS collected from Jade Locke all money she earned from commercial sex acts.

21. On or about March 2007 through May 2007, Defendant ANDRE MCDANIELS paid the airfare for Jade Locke to fly from Houston to Las Vegas to engage in prostitution.

23. On or about April 10, 2007, Defendant WILLIAM HORNBEAK instructed Defendant KRISTIN LAND to place an sexually oriented advertisement of B.S.R.

24. On or about April 11, 2007, Defendant KRISTIN LAND posted a sexually oriented advertisement for B.S.R, then still a minor, advertising B.S.R. as "just turned 18 and ready."

25. On or about May 18, 2007, Defendant WILLIAM HORNBEAK received a call relating a low supply of condoms at a spa known as Paris of Katy, and agreed to re-supply the requested condoms.

26. **All in violation of Title 18, United States Code, Section 371.**

COUNT TWO
Sex Trafficking by Force, Fraud, or Coercion

Between on or about May 2005 and on or about September 2008, in the Southern District of Texas and elsewhere, Defendants JOHN BUTLER, WILLIAM HORNBEAK, ANDRE MCDANIELS and JAMINE LAKE knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, and obtain by any means Jessica Ford, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in such acts of recruiting, enticing, harboring, transporting, providing, and obtaining by any

means of Jessica Ford, knowing that means of force, fraud, and coercion would be used to cause Jessica Ford to engage in a commercial sex act, **in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2) and 2.**

COUNT THREE
Transportation

Between on or about July 1, 2005 and on or about July 31, 2009, in the Southern District of Texas and elsewhere, Defendant ANDRE MCDANIELS knowingly transported Jessica Ford in interstate commerce, from the State of Nevada to the State of Texas with the intent that Jessica Ford engage in prostitution, and in any sexual activity for which any person can charged with a criminal offense, **in violation of Title 18, United States Code, Section 2421.**

COUNT FOUR
Sex Trafficking of Children

Between on or about May 1, 2005, and on or about July 31, 2005, in the Southern District of Texas and elsewhere, Defendant RONNIE PRESLEY knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, and obtain by any means J.N.W., knowing that J.N.W. had not attained the age of 18 years and would be caused to engage in a commercial sex act, **in violation of Title 18, United States Code, Sections 1591(a)(1).**

COUNT FIVE
Transportation of Minors

Between on or about May 1, 2005, and on or about May 31, 2005, in the Southern District of Texas and elsewhere, Defendant RONNIE PRESLEY, knowingly transported J.N.W., who had not attained the age of 18 years, in interstate commerce, from the State of Kansas to the State of Texas, with the intent that J.N.W. engage in prostitution and other sexual activity for which

any person could be charged with a criminal offense, **in violation of Title 18, United States Code, Sections 2423(a).**

COUNT SIX
Transportation of Minors

Between on or about July 1, 2005, and on or about July 31, 2005, in the Southern District of Texas and elsewhere, Defendant RONNIE PRESLEY, knowingly transported J.N.W., who had not attained the age of 18 years, in interstate commerce, from the State of Kansas to the State of Texas, with the intent that J.N.W. would engage in prostitution and other sexual activity for which any person could be charged with a criminal offense, **in violation of Title 18, United States Code, Sections 2423(a).**

COUNT SEVEN
Transportation

Between on or about February 1, 2006, and on or about February 28, 2006, in the Southern District of Texas and elsewhere, Defendant ANDRE MCDANIELS knowingly transported Ashley Callahan in interstate commerce, from the State of Kansas to the State of Texas with the intent that Ashley Callahan engage in prostitution, and in any sexual activity for which any person can charged with a criminal offense, **in violation of Title 18, United States Code, Section 2421.**

COUNT EIGHT
Coercion and Enticement

Between on or about February 1, 2006, and on or about February 28, 2006, in the Southern District of Texas and elsewhere, Defendant ANDRE MCDANIELS knowingly persuaded, induced,

enticed, and coerced Ashley Callahan to travel in interstate commerce, to engage in prostitution, and in any sexual activity for which any person can charged with a criminal offense, **in violation of Title 18, United States Code, Section 2422(a).**

COUNT NINE
Sex Trafficking of Children

Between on or about May 1, 2006, and on or about June 30, 2006, in the Southern District of Texas and elsewhere, Defendant RONNIE PRESLEY, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, and obtain by any means A.M., knowing that A.M. had not attained the age of 18 years and would be caused to engage in a commercial sex act, **in violation of Title 18, United States Code, Sections 1591(a)(1).**

COUNT TEN
Sex Trafficking of Children

Between on or about September 1, 2006, and on or about October 31, 2006, in the Southern District of Texas and elsewhere, Defendants RONNIE PRESLEY and JAMINE LAKE, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, and obtain by any means J.N.M.W, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in such acts of recruiting, enticing, harboring, transporting, providing, and obtaining by any means of J.N.M.W., knowing J.N.M.W. had not attained the age of 18 years and would be caused to engage in a commercial sex act, **in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2) and 2.**

COUNT ELEVEN
Transportation of Minors

Between on or about September 1, 2006, and on or about September 30, 2006, in the Southern District of Texas and elsewhere, Defendant RONNIE PRESLEY, knowingly transported J.M.NW., who had not attained the age of 18 years, in interstate commerce, from the State of Kansas to the State of Texas, with the intent that J.N.M.W. would engage in prostitution and other sexual activity for which any person could be charged with a criminal offense, **in violation of Title 18, United States Code, Sections 2423(a).**

COUNT TWELVE
Sex Trafficking of Children

Between on or about April 5, 2006, and on or about April 21, 2007, in the Southern District of Texas and elsewhere, Defendants WILLIAM HORNBEAK and ANDRE MCDANIELS, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, and obtain B.S.R., knowing that B.S.R. had not attained the age of 18 years and would be caused to engage in a commercial sex act, **in violation of Title 18, United States Code, Sections 1591(a)(1).**

COUNT THIRTEEN
Sex Trafficking by Force, Fraud or Coercion

Between on or about April 23, 2007, and on or about December 1, 2008, in the Southern District of Texas and elsewhere, Defendant WILLIAM HORNBEAK, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, and obtain by any means Brittnay Starr Reding, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in such acts of recruiting, enticing, harboring,

transporting, providing, and obtaining by any means Brittney Starr Reding, knowing that means of force, fraud, and coercion would be used to cause Brittney Starr Reding to engage in a commercial sex act, **in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2) and 2.**

COUNT FOURTEEN
Transportation

Between on or about May 1, 2007, and on or about May 31, 2007, in the Southern District of Texas and elsewhere, Defendant WILLIAM HORNBEAK knowingly transported Brittney Starr Reding in interstate commerce, from the State of Florida to the State of Texas, to engage in prostitution, and in any sexual activity for which any person can be charged with a criminal offense, **in violation of Title 18, United States Code, Section 2421.**

COUNT FIFTEEN
Sex Trafficking of Children

Between on or about October 1, 2006, and on or about April 31, 2007, in the Southern District of Texas and elsewhere, Defendant ANDRE MCDANIELS knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, and obtain K.S.H., knowing that K.S.H. had not attained the age of 18 years and would be caused to engage in a commercial sex act, **in violation of Title 18, United States Code, Sections 1591(a)(1).**

COUNT SIXTEEN
Transportation

Between on or about March 1, 2007, and on or about May 31, 2007, in the Southern District of Texas and elsewhere, Defendant WILLIAM HORNBEAK knowingly transported Jade Locke in interstate commerce, from the State of Texas to the State of Nevada, with the intent that

Jade Locke engage in prostitution, and in any sexual activity for which any person can be charged with a criminal offense, **in violation of Title 18, United States Code, Section 2421.**

A TRUE BILL

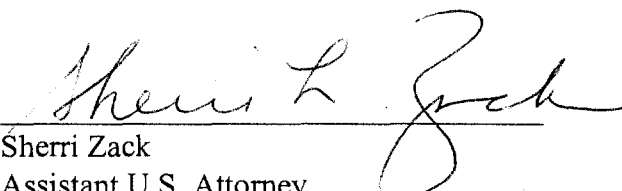
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ORIGINAL SIGNATURE ON FILE

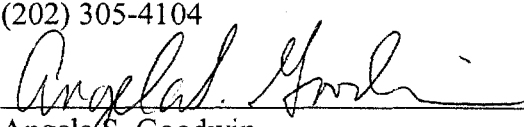
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